

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

MARY LALIBERTE, *et al.*,

Plaintiffs,

v.

QUANTA SERVICES, INC.,

Defendant.

Case No. 4:22-cv-03290

Date: November 5, 2024

**PLAINTIFFS' UNOPPOSED MOTION TO FILE EXPANDED BRIEFING**

Plaintiffs, Mary Laliberte and Marie McKnight (collectively, "Plaintiffs"), hereby respectfully move the Court for an order permitting their forthcoming reply brief in support of Plaintiffs' Motion for Class Certification to exceed the default page limit and comprise 10 pages (inclusive of the case style, any table of contents or authorities, and signature block). In support thereof, Plaintiffs state as follows:

1. Plaintiffs filed their Motion for Class Certification in this matter on September 20, 2024. (ECF No. 71).
2. Defendant, Qanta Services, Inc. ("Defendant"), filed its opposition brief on November 5, 2024 (ECF No. 71), asserting numerous arguments against class certification.
3. Despite good faith efforts to comply with the page limits set by the Local Rules and the Court's Practices and Procedures, Plaintiffs have determined that, given the number of issues raised in Defendant's opposition, a full and fair exposition of their arguments will require an enlarged reply brief in excess of five pages. Plaintiffs submit that a brief of 10 pages will

provide the Court with adequate briefing from which to make an informed decision on their Motion for Class Certification.

4. Plaintiffs' counsel contacted Defendant's counsel to discuss this motion, and Defendant's counsel indicated that Defendant does not object to this request.

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and permit Plaintiffs to file a reply in support of their Motion for Class Certification of up to 10 pages (inclusive of the case style, any table of contents or authorities, and signature block).

DATED: November 5, 2024

Respectfully Submitted,

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*Attorneys for Plaintiffs, the Plan,  
and the Proposed Class*

**CERTIFICATE OF CONFERENCE**

The undersigned counsel certifies that counsel for the parties have conferred via email regarding Plaintiffs' Motion for Leave to File Expanded Briefing and that Defendant does not oppose the motion.

/s/ John S. "Jack" Edwards, Jr.  
John S. "Jack" Edwards, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing using the CM/ECF system on November 5, 2024, which will send an electronic notification of such filing to all counsel of record.

/s/ John S. "Jack" Edwards, Jr.  
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